

Soji Honma
Heartland Automotive, LLC
P.O. Box 648
Greencastle, Indiana 46135-0648

Re: **133-13901**
Significant Source Modification to:
Part 70 Operating Permit No.: **T 133-12495-00027**

Dear Mr. Honma:

Heartland Automotive, LLC was issued a Part 70 Operating Permit (T 133-12495-00027) on June 14, 2001, for a miscellaneous automotive parts manufacturing source. An application to modify the source was received on February 9, 2001. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) One (1) surface coating line, with a capacity of 57.7 vehicles per hour, consisting of three (3) spray booths in series, using high-volume low-pressure (HVL) spray equipment, equipped with a wet scrubber for overspray control and exhausting to Stacks S-4 through S-7.
- (b) One (1) natural gas-fired bake oven, identified as S-12, exhausting to Stack S-12, rated at 3.5 million British thermal units per hour.
- (c) One (1) natural gas-fired bake oven afterburner, identified as S-13, exhausting to Stack S-13, rated at 2.5 million British thermal units per hour.
- (d) One (1) natural gas-fired dry off oven, identified as S-15, exhausting to Stack S-15, rated at 0.5 million British thermal units per hour.
- (e) One (1) natural gas-fired heat exchange, identified as MAU-3, exhausting to general ventilation, rated at 33.88 million British thermal units per hour.
- (f) One (1) natural gas-fired heat exchange, identified as MAU-4, exhausting to general ventilation, rated at 5.05 million British thermal units per hour.

This Significant Source Modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 operating permit as a Significant Permit Modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the Significant Permit Modification (SPM 133-14515-00027) has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Edward A. Longenberger, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
EAL/MES

cc: File - Putnam County
U.S. EPA, Region V
Putnam County Health Department
Air Compliance Section Inspector - Marc Goldman
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR QUALITY

**Heartland Automotive, LLC
300 South Warren Drive
Greencastle, Indiana 46135**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| | |
|-----------------------------------------------------------------------------------------|------------------------------|
| Source Modification No.: 133-13901-00027 | |
| Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality | Issuance Date: July 13, 2001 |

TABLE OF CONTENTS

| | | |
|------------|-------------------------------------------------------------------------------------------------------------|----|
| A | SOURCE SUMMARY | 4 |
| A.1 | General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] | |
| A.2 | Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] | |
| A.3 | Part 70 Permit Applicability [326 IAC 2-7-2] | |
| B | GENERAL CONSTRUCTION CONDITIONS | 5 |
| B.1 | Definitions [326 IAC 2-7-1] | |
| B.2 | Effective Date of the Permit [IC13-15-5-3] | |
| B.3 | Revocation of Permits [326 IAC 2-1.1-9(5)] [326 IAC 2-7-10.5(i)] | |
| B.4 | Significant Source Modification [326 IAC 2-7-10.5(h)] | |
| C | GENERAL OPERATION CONDITIONS | 6 |
| C.1 | Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)] | |
| C.2 | Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3] | |
| C.3 | Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12] | |
| C.4 | Opacity [326 IAC 5-1] | |
| C.5 | Fugitive Dust Emissions [326 IAC 6-4] | |
| C.6 | Operation of Equipment [326 IAC 2-7-6(6)] | |
| C.7 | Stack Height [326 IAC 1-7] | |
| | Testing Requirements [326 IAC 2-7-6(1)] | |
| C.8 | Performance Testing [326 IAC 3-6] [326 IAC 2-1.1-11] | |
| | Compliance Requirements [326 IAC 2-1.1-11] | |
| C.9 | Compliance Requirements [326 IAC 2-1.1-11] | |
| | Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)] | |
| C.10 | Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)] | |
| C.11 | Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)] | |
| | Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] | |
| C.12 | Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] | |
| C.13 | Emergency Provisions [326 IAC 2-7-16] | |
| C.14 | Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6] | |
| | Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] | |
| C.15 | General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] | |
| C.16 | General Reporting Requirements [326 IAC 2-7-5(3)(C)] | |
| D.1 | FACILITY OPERATION CONDITIONS - One (1) surface coating line | 14 |
| | Emission Limitations and Standards [326 IAC 2-7-5(1)] | |
| D.1.1 | Volatile Organic Compounds [326 IAC 8-1-6] [326 IAC 2-2] [40 CFR 52.21] | |
| D.1.2 | Particulate Matter (PM) [326 IAC 6-3-2] | |
| D.1.3 | Preventive Maintenance Plan [326 IAC 2-7-5(13)] | |

Compliance Determination Requirements

- D.1.4 Volatile Organic Compounds (VOC)
- D.1.5 VOC Emissions
- D.1.6 Particulate Matter (PM)

Compliance Monitoring Requirements

- D.1.7 Parametric Monitoring
- D.1.8 Scrubber Inspection
- D.1.9 Failure Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.10 Record Keeping Requirements
- D.1.11 Reporting Requirements

| | |
|-------------------------------|----|
| Certification | 18 |
| Quarterly Report | 19 |

SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary plastic automotive parts manufacturing source.

| | |
|-----------------------|------------------------------------------------------------------------------------------------------------|
| Responsible Official: | Soji Honma |
| Source Address: | 300 South Warren Drive, Greencastle, Indiana 46135 |
| Mailing Address: | P.O. Box 648, 300 South Warren Drive, Greencastle, Indiana 46135 |
| Phone Number: | 219 - 223 - 3164 |
| SIC Code: | 3089 and 3999 |
| County Location: | Putnam |
| County Status: | Attainment for all criteria pollutants |
| Source Status: | Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act |

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) surface coating line, with a capacity of 57.7 vehicles per hour, consisting of three (3) spray booths in series, using high-volume low-pressure (HVLP) spray equipment, equipped with a wet scrubber for overspray control and exhausting to Stacks S-4 through S-7.
- (b) One (1) natural gas-fired bake oven, identified as S-12, exhausting to Stack S-12, rated at 3.5 million British thermal units per hour.
- (c) One (1) natural gas-fired bake oven afterburner, identified as S-13, exhausting to Stack S-13, rated at 2.5 million British thermal units per hour.
- (d) One (1) natural gas-fired dry off oven, identified as S-15, exhausting to Stack S-15, rated at 0.5 million British thermal units per hour.
- (e) One (1) natural gas-fired heat exchange, identified as MAU-3, exhausting to general ventilation, rated at 33.88 million British thermal units per hour.
- (f) One (1) natural gas-fired heat exchange, identified as MAU-4, exhausting to general ventilation, rated at 5.05 million British thermal units per hour.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.3 Revocation of Permits [326 IAC 2-1.1-9(5)] [326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.4 Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (e) In the event that the Part 70 application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:
 - (1) If the Part 70 draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Part 70 draft.
 - (2) If the Part 70 permit has gone thru final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go through a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Part 70 permit at the time of issuance.
 - (3) If the Part 70 permit has not gone through public notice, but has not gone through final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Part 70 permit, and the Title V permit will be issued after EPA review.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The

records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this approval:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6] [326 IAC 2-1.1-11]

- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

C.11 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

- (b) Whenever a condition in this permit requires the measurement of a flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.15 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it

is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) surface coating line, with a capacity of 57.7 vehicles per hour, consisting of three (3) spray booths in series, using high-volume low-pressure (HVLP) spray equipment, equipped with a wet scrubber for overspray control and exhausting to Stacks S-4 through S-7.
- (b) One (1) natural gas-fired bake oven, identified as S-12, exhausting to Stack S-12, rated at 3.5 million British thermal units per hour.
- (c) One (1) natural gas-fired bake oven afterburner, identified as S-13, exhausting to Stack S-13, rated at 2.5 million British thermal units per hour.
- (d) One (1) natural gas-fired dry off oven, identified as S-15, exhausting to Stack S-15, rated at 0.5 million British thermal units per hour.
- (e) One (1) natural gas-fired heat exchange, identified as MAU-3, exhausting to general ventilation, rated at 33.88 million British thermal units per hour.
- (f) One (1) natural gas-fired heat exchange, identified as MAU-4, exhausting to general ventilation, rated at 5.05 million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds [326 IAC 8-1-6] [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the one (1) surface coating line has been determined to be:

- (a) The total VOC delivered to the applicators, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 187.4 tons per twelve (12) consecutive month period. Compliance with this limit renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable;
- (b) The method of application at the one (1) surface coating line shall be performed with high volume-low pressure (HVLP) spray applicators or the equivalent; and
- (c) The following management and work practices shall apply:
 - (1) Operator training course.
 - (2) Spray gun cleaning.
 - (3) The cleanup solvent containers used to transport solvent from drums/containers to work stations be closed containers having soft gasketed closures.
 - (4) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.

- (5) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
- (6) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the one (1) surface coating line shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) surface coating line and any control devices.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.5 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.1.6 Particulate Matter (PM)

In order to comply with Condition D.1.2, the wet scrubber for PM control shall be in operation and control emissions from the one (1) surface coating line at all times when the one (1) surface coating line is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Parametric Monitoring

The Permittee shall record the flow rate and the total static pressure drop across the scrubber at least once per shift when the one (1) surface coating line is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise or unknown events for which response steps are subsequently devised, the flow rate shall be maintained within the range of 3,900 to 4,300 gallons per minute and the pressure drop across the scrubber shall be maintained within the range of 1 to 6 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.8 Scrubber Inspection

An inspection shall be performed each calendar quarter of the scrubber. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection.

D.1.9 Failure Detection

In the event that a scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.1.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) The cleanup solvent usage for each month;
- (4) The total VOC usage for each month; and
- (5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.7, the Permittee shall maintain the following:

- (1) Records of the following operational parameters once per shift during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Flow rate.
- (2) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.1.8, the Permittee shall maintain records of the results of the inspections required under Condition D.1.8.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using

the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135-0648
Mailing Address: P.O. Box 648, Greencastle, Indiana 46135-0648
Source Modification No.: 133-13901-00027

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Source Modification Quarterly Report

Source Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135-0648
Mailing Address: P.O. Box 648, Greencastle, Indiana 46135-0648
Source Modification No.: 133-13901-00027
Facility: One (1) surface coating line
Parameter: Total VOC delivered to the applicators
Limit: Less than 187.4 tons per twelve (12) consecutive month period

YEAR: _____

| Month | VOC (tons) | VOC (tons) | VOC (tons) |
|-------|------------|--------------------|----------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Source Modification

Source Background and Description

| | |
|---------------------------------------------|-----------------------------------------------------|
| Source Name: | Heartland Automotive, LLC |
| Source Location: | 300 South Warren Drive, Greencastle, Indiana |
| County: | Putnam |
| SIC Code: | 3089, 3999 |
| Operation Permit No.: | T 133-12495-00027 |
| Operation Permit Issuance Date: | Not Yet Issued |
| Significant Source Modification No.: | SSM 133-13901-00027 |
| Permit Reviewer: | Edward A. Longenberger |

The Office of Air Quality (OAQ) has reviewed a modification application from Heartland Automotive, LLC relating to the construction of the following emission units and pollution control devices:

- (a) One (1) surface coating line, with a capacity of 57.7 vehicles per hour, consisting of three (3) spray booths in series, using high-volume low-pressure (HVLP) spray equipment, equipped with a wet scrubber for overspray control and exhausting to Stacks S-4 through S-7.
- (b) One (1) natural gas-fired bake oven, identified as S-12, exhausting to Stack S-12, rated at 3.5 million British thermal units per hour.
- (c) One (1) natural gas-fired bake oven afterburner, identified as S-13, exhausting to Stack S-13, rated at 2.5 million British thermal units per hour.
- (d) One (1) natural gas-fired dry off oven, identified as S-15, exhausting to Stack S-15, rated at 0.5 million British thermal units per hour.
- (e) One (1) natural gas-fired heat exchange, identified as MAU-3, exhausting to general ventilation, rated at 33.88 million British thermal units per hour.
- (f) One (1) natural gas-fired heat exchange, identified as MAU-4, exhausting to general ventilation, rated at 5.05 million British thermal units per hour.

History

On February 9, 2001, Heartland Automotive, LLC submitted an application to the OAQ requesting to add an additional surface coating line to their existing plant.

Existing Approvals

The source applied for a Part 70 Operating Permit T 133-12495-00027 on July 18, 2000. The source has been operating under previous approvals including, but not limited to the following:

- (a) Registration Letter, issued on February 14, 1989;
- (b) CP 133-2288-00027, issued on August 2, 1994;
- (c) CP 133-8350-00027, issued on April 3, 1997;
- (d) MSOP 133-10520-00027, issued on May 24, 1999;
- (e) MPR 133-12303-00027, issued on July 26, 2000.

Enforcement Issue

Heartland Automotive, LLC was issued a Minor Source Operating Permit (MSOP 133-10520-00027) on May 24, 1999. That permit required the source to submit a Part 70 application within twelve (12) months of the post-marked submission date of the Affidavit of Construction, which was July 7, 1999. The Part 70 application was received July 18, 2000. IDEM is reviewing this matter and will take appropriate action.

Stack Summary

| Stack ID | Operation | Height (feet) | Diameter (feet) | Flow Rate (acfm) | Temperature (EF) |
|----------|---------------------------|---------------|-----------------|------------------|------------------|
| 4 | Spray Booth | 65 | 5 | 55,700 | 70 |
| 5 | Spray Booth | 65 | 5 | 55,700 | 70 |
| 6 | Spray Booth | 65 | 5 | 55,700 | 70 |
| 7 | Spray Booth | 65 | 2.75 | 17,000 | 70 |
| 10 | Mixing Room | 65 | 1.92 | 8,500 | 70 |
| 11 | Bake Oven Indirect Heater | 65 | 0.833 | 1,500 | 572 |
| 12 | Bake Oven | 65 | 1 | 2,330 | 257 |
| 13 | Bake Oven Afterburner | 65 | 1.33 | 3,900 | 745 |
| 14 | Power Wash | 65 | 1.75 | 7,100 | 70 |
| 15 | Dry Off Oven | 65 | 10 | 1,100 | 176 |

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 9, 2001. Additional information was received on March 14, 2001 and April 2, 2001.

Emission Calculations

See pages 1 through 4 of 4 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Pollutant | Potential To Emit (tons/year) |
|------------------|------------------------------------------|
| PM | 94.19 |
| PM ₁₀ | 95.32 |
| SO ₂ | 0.119 |
| VOC | 551.9 |
| CO | 16.71 |
| NO _x | 19.90 |

| HAPs | Potential To Emit (tons/year) |
|-------------------|------------------------------------------|
| MIBK | 20.4 |
| Methanol | 19.3 |
| Ethyl Benzene | 14.4 |
| Xylene | 128 |
| Isopropyl benzene | 1.33 |
| Benzene | 0.0004 |
| Dichlorobenzene | 0.0002 |
| Formaldehyde | 0.310 |
| Hexane | 0.358 |
| Toluene | 138 |
| Lead Compounds | 0.0001 |
| Cadmium Compounds | 0.0002 |

| HAPs | Potential To Emit (tons/year) |
|---------------------|----------------------------------|
| Chromium Compounds | 0.0003 |
| Manganese Compounds | 0.00008 |
| Nickel Compounds | 0.0004 |
| TOTAL | 322 |

Justification for Modification

- (a) The Part 70 Operating Permit is being modified through a Part 70 Significant Source Modification to a yet to be issued Part 70 Operating Permit because the potential to emit before controls of this modification exceeds twenty five (25) tons per year. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4).
- (b) Since the Part 70 Operating Permit for this source has not been issued yet, the approval of this Significant Source Modification will allow the source to construct and operate.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Putnam County.

| Pollutant | Status |
|------------------|------------|
| PM ₁₀ | attainment |
| SO ₂ | attainment |
| NO ₂ | attainment |
| Ozone | attainment |
| CO | attainment |
| Lead | attainment |

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Putnam County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Putnam County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (c) **Fugitive Emissions**
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

| Pollutant | Emissions (tons/year) |
|------------------|-----------------------|
| PM | 10.6 |
| PM ₁₀ | 10.6 |
| SO ₂ | 0.025 |
| VOC | less than 60.4 |
| CO | 3.51 |
| NO _x | 4.18 |

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the Technical Support Document for the pending Part 70 Operating Permit (T 133-12495-00027).

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

| Process/facility | Potential to Emit (tons/year) | | | | | | |
|-----------------------|-------------------------------|------------------|-----------------|--------|------|-----------------|------|
| | PM | PM ₁₀ | SO ₂ | VOC | CO | NO _x | HAPs |
| Proposed Modification | 3.57 | 4.70 | 0.119 | 188.44 | 16.7 | 19.9 | 110 |
| PSD Threshold Level | 250 | 250 | 250 | 250 | 250 | 250 | - |

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Pursuant to 326 IAC 8-1-6, the VOC emissions from the proposed surface coating line will be limited to less than 187.4 tons per year. The PM and HAPs emissions from the surface coating line have been scaled down from their full potential to this BACT limit.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T 123-12495-00027) application on July 18, 2000. The plastic automotive parts surface coating line being reviewed under this permit shall be incorporated into the Part 70 operating permit after the Part 70 permit is issued.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61, 62 and 63) applicable to this proposed modification.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

The plastic parts being coated by the proposed equipment are produced within the existing source. The parts are manufactured at the insignificant injection molding machines, which were installed in 1989. The proposed equipment cannot produce finished product by itself, and therefore the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the one (1) surface coating line shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The wet scrubber shall be in operation at all times the one (1) surface coating line is in operation, in order to comply with this limit.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The potential to emit VOC from the proposed surface coating line, which will coat plastic automotive parts, is greater than twenty-five (25) tons per year. Therefore, the one (1) surface coating line is subject to the Best Available Control Technology (BACT) requirements, pursuant to this 326 IAC 8-1-6.

A top-down BACT analysis from Heartland Automotive, LLC was received on February 9, 2001, with additional information received on March 16, 2001 and March 25, 2001. The BACT analysis evaluated four (4) options: installation of an electrostatic painting system, using water-based paints,

installation of a catalytic incinerator, and the use of HVLP applicators. The source has agreed to limit the VOC emissions from the surface coating line to 187.4 tons per year. This baseline was used for the BACT analysis.

Electrostatic painting is not technically feasible for this operation since the object being coated must conduct electricity. The use of water-based paints is not technically feasible because such paints will not provide a finish that meets customer specifications.

Catalytic incineration, with a cost of \$3,443 per ton of VOC removed, is not economically feasible since the total annualized cost of the incinerator is 127.74% of source's pre-tax profit. Cost information for this option is detailed in the attached BACT Cost Analysis.

BACT for the one (1) surface coating line has been determined to be:

- (a) The total VOC delivered to the applicators, including coatings, dilution solvents, and cleaning solvents, will be limited to less than 187.4 tons per twelve (12) consecutive month period;
- (b) The method of application at the one (1) surface coating line shall be performed with high volume-low pressure (HVLP) spray applicators or the equivalent; and
- (c) The following management and work practices shall apply:
 - (1) Operator training course.
 - (2) Spray gun cleaning.
 - (3) The cleanup solvent containers used to transport solvent from drums/containers to work stations be closed containers having soft gasketed closures.
 - (4) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.
 - (5) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
 - (6) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitor-

ing conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The one (1) surface coating line has applicable compliance monitoring conditions as specified below:

- (a) The Permittee shall record the flow rate and the total static pressure drop across the scrubber at least once per shift when the one (1) surface coating line is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise or unknown events for which response steps are subsequently devised, the flow rate shall be maintained within the range of 3,900 to 4,300 gallons per minute and the pressure drop across the scrubber shall be maintained within the range of 1 to 6 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) An inspection shall be performed each calendar quarter of the scrubber. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection.
- (c) In the event that a scrubber failure has been observed, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the wet scrubber for one (1) surface coating operation must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Conclusion

The construction and operation of this plastic automotive parts surface coating line shall be subject to the conditions of the attached proposed Significant Source Modification No. 133-13901-00027.

BACT Cost Analysis

Facility Name: Heartland Automotive, LLC
 Location: Greencastle, Indiana
 Permit No.: SSM 133-13901-00027
 Permit Reviewer: MES

Capital Cost

| Option | Base Price | Direct Cost | Indirect Cost | Total |
|------------------------|-------------|-------------|---------------|-------------|
| Catalytic Incineration | \$1,515,000 | \$75,000 | \$40,000 | \$1,630,000 |
| | | | | |
| | | | | |
| | | | | |

Annual Operating, Maintenance & Recovery Cost

| Option | Direct Cost | Indirect Cost | Capital Recovery Cost | Total |
|------------------------|-------------|---------------|-----------------------|-----------|
| Catalytic Incineration | \$203,940 | \$30,000 | \$404,738 | \$638,678 |
| | | | | |
| | | | | |
| | | | | |

Evaluation

| Option | Potential Emissions (tons/yr) | Emissions Removed (tons/yr) | Control Efficiency (%) | \$/ton removed |
|------------------------|-------------------------------|-----------------------------|------------------------|----------------|
| Catalytic Incineration | 187.35 | 185.48 | 99 | \$3443.38 |
| | | | | |
| | | | | |
| | | | | |

Methodology:

Emissions removed = (potential emissions)*(control efficiency)
 \$/ton removed = total annual cost/emissions removed

The cost breakdown is as follows:

1. Capital Cost

- a) Base price: purchase price, auxiliary equipment, instruments, controls, taxes and freight.

- b) Direct installation cost: foundations/supports, erection/handling, electrical, piping, insulation, painting, site preparation and building/facility.
- c) Indirect installation cost: engineering, supervision, construction/filed expenses, construction fee, start up, performance test, model study and contingencies.

2. Annual Cost

- a) Direct operating cost: operating labor (operator, supervisor), labor and material maintenance, operating materials, utilities (electricity, gas).
- b) Indirect operating cost: overhead, property tax, insurance, administration and capital recovery cost (for X yrs life of the system at X% interest rate).

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Heartland Automotive, LLC
Address City IN Zip: 300 South Warren Drive, Greencastle, Indiana 46135
Part 70 SSM: 133-13901
Pt ID: 133-00027
Reviewer: Edward A. Longenberger
Date: February 9, 2001

| Material | Density (lbs/gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (units/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC (pounds per hour) | Potential VOC (pounds per day) | Potential VOC (tons per year) | Particulate Potential (tons/yr) | lbs VOC/gal solids | Transfer Efficiency |
|--------------------------|-------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|----------------------|---------------------------------------------|----------------------------------|---------------------------------|--------------------------------|-------------------------------|---------------------------------|--------------------|---------------------|
| Prime Booth | | | | | | | | | | | | | | | | |
| F1202 | 8.26 | 73.11% | 0.00% | 73.11% | 0.00% | 15.79% | 0.09600 | 57.700 | 6.04 | 6.04 | 33.45 | 802.81 | 146.51 | 13.47 | 38.25 | 75% |
| SIA 65 | 7.30 | 100.00% | 0.00% | 100.00% | 0.00% | 0.00% | 0.04800 | 57.700 | 7.30 | 7.30 | 20.22 | 485.23 | 88.56 | 0.00 | NA | 75% |
| R-T-S | 7.94 | 81.35% | 0.00% | 81.35% | 0.00% | 10.53% | 0.14400 | 57.700 | 6.46 | 6.46 | 53.67 | 1288.05 | 235.07 | 13.47 | 61.36 | 75% |
| Color Base Booth | | | | | | | | | | | | | | | | |
| F1209 | 8.20 | 49.31% | 0.00% | 49.31% | 0.00% | 43.00% | 0.07345 | 57.700 | 4.04 | 4.04 | 17.14 | 411.28 | 75.06 | 19.29 | 9.40 | 75% |
| F3056 | 7.58 | 80.00% | 0.00% | 80.00% | 0.00% | 18.30% | 0.00073 | 57.700 | 6.06 | 6.06 | 0.26 | 6.17 | 1.13 | 0.07 | 33.14 | 75% |
| SIA 30 | 7.10 | 100.00% | 0.00% | 100.00% | 0.00% | 0.00% | 0.00881 | 57.700 | 7.10 | 7.10 | 3.61 | 86.66 | 15.82 | 0.00 | NA | 75% |
| R-T-S | 8.08 | 54.30% | 0.00% | 54.30% | 0.00% | 38.22% | 0.08300 | 57.700 | 4.39 | 4.39 | 21.00 | 504.11 | 92.00 | 19.36 | 11.48 | 75% |
| Clear Coat Booth | | | | | | | | | | | | | | | | |
| F3081 | 8.50 | 38.00% | 0.0% | 38.0% | 0.0% | 55.10% | 0.11364 | 57.700 | 3.23 | 3.23 | 21.18 | 508.28 | 92.76 | 37.84 | 5.86 | 75% |
| F3056 | 7.58 | 80.00% | 0.0% | 80.0% | 0.0% | 18.30% | 0.00284 | 57.700 | 6.06 | 6.06 | 0.99 | 23.86 | 4.35 | 0.27 | 33.14 | 75% |
| SIA 95 | 7.10 | 100.00% | 0.0% | 100.0% | 0.0% | 0.00% | 0.00852 | 57.700 | 7.10 | 7.10 | 3.49 | 83.80 | 15.29 | 0.00 | NA | 75% |
| R-T-S | 8.38 | 42.44% | 0.00% | 42.44% | 0.00% | 50.51% | 0.12500 | 57.700 | 3.56 | 3.56 | 25.66 | 615.94 | 112.41 | 38.11 | 7.05 | 75% |
| SIA Purge Solvent | | | | | | | | | | | | | | | | |
| | 6.92 | 54.90% | 0.0% | 54.9% | 0.0% | 0.00% | 0.11600 | 57.700 | 3.80 | 3.80 | 25.43 | 610.27 | 111.37 | 22.87 | NA | 75% |

| | | | | | | | | |
|----------------------------------|-----------------------------------------------|-------------------------------------|--------------------------|--------------|----------------|----------------|---------------|--------------|
| State Potential Emissions | Add worst case coating to all solvents | PM | Control Efficiency | 90.00% | | | | |
| | | | Uncontrolled | | 125.77 | 3018.36 | 550.85 | 93.81 |
| | | | Controlled | | 125.77 | 3018.36 | 550.85 | 9.38 |
| | | | Limited Potential | | 42.77 | 1026.58 | 187.35 | 31.91 |
| | | Controlled Limited Potential | | 42.77 | 1026.58 | 187.35 | 3.19 | |

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations
HAP Emission Calculations**

Company Name: Heartland Automotive, LLC
Address City IN Zip: 300 South Warren Drive, Greencastle, Indiana 46135
Part 70 SSM: 133-13901
Plt ID: 133-00027
Reviewer: Edward A. Longenberger
Date: February 9, 2001

| Material | Density (lbs/gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Xylene | Weight % Toluene | Weight % Formaldehyde | Weight % MIBK | Weight % Ethyl Benzene | Weight % Glycol Ethers | Weight % Isopropylbenzene | Weight % Methanol | Xylene Emissions (tons/yr) | Toluene Emissions (tons/yr) | Formaldehyde Emissions (tons/yr) | MIBK Emissions (tons/yr) | Ethyl Benzene Emissions (tons/yr) | Glycol Ethers Emissions (tons/yr) | Isopropylbenzene Emissions (tons/yr) | Methanol Emissions (tons/yr) | | |
|-------------------------------|-------------------|--------------------------------|---------------------|-----------------|------------------|-----------------------|---------------|------------------------|------------------------|---------------------------|-------------------|----------------------------|-----------------------------|----------------------------------|--------------------------|-----------------------------------|-----------------------------------|--------------------------------------|------------------------------|-------|--|
| Prime Booth (S-4) | | | | | | | | | | | | | | | | | | | | | |
| F1202 | 8.26 | 0.09600 | 57.700 | 6.60% | 56.30% | 0.00% | 10.20% | 0.00% | 0.00% | 0.00% | 0.00% | 13.23 | 112.83 | 0.00 | 20.44 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| SIA 65 | 7.30 | 0.04800 | 57.700 | 1.50% | 0.00% | 0.00% | 0.00% | 0.30% | 0.00% | 1.50% | 0.00% | 1.33 | 0.00 | 0.00 | 0.00 | 0.27 | 0.00 | 1.33 | 0.00 | 0.00 | |
| Color Base Booth (S-5) | | | | | | | | | | | | | | | | | | | | | |
| F1209 | 8.20 | 0.07345 | 57.700 | 17.28% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 26.30 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| F3056 | 7.58 | 0.00073 | 57.700 | 0.00% | 52.50% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.74 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| SIA 30 | 7.10 | 0.00881 | 57.700 | 0.00% | 71.28% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 11.27 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Clear Coat Booth (S-6) | | | | | | | | | | | | | | | | | | | | | |
| F3081 | 8.50 | 0.11364 | 57.700 | 6.85% | 2.69% | 0.12% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 16.72 | 6.57 | 0.30 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| F3056 | 7.58 | 0.00284 | 57.700 | 0.00% | 52.50% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 2.86 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| SIA 95 | 7.10 | 0.00852 | 57.700 | 46.58% | 23.42% | 0.00% | 0.00% | 9.17% | 0.00% | 0.00% | 0.00% | 7.12 | 3.58 | 0.00 | 0.00 | 1.40 | 0.00 | 0.00 | 0.00 | 0.00 | |
| SIA Purge Solvent | 6.92 | 0.11600 | 57.700 | 31.17% | 0.00% | 0.00% | 0.00% | 6.27% | 0.00% | 0.00% | 9.52% | 63.23 | 0.00 | 0.00 | 0.00 | 12.72 | 0.00 | 0.00 | 0.00 | 19.31 | |
| Individual Total | | | | | | | | | | | | 128 | 138 | 0.295 | 20.4 | 14.4 | 0.000 | 1.33 | 19.3 | | |
| Overall Total | | | | | | | | | | | | 322 | | | | | | | | | |
| BACT limit ratio | | | | | | | | | | | | 0.3401 | | | | | | | | | |
| Limited Overall Total | | | | | | | | | | | | 109 | | | | | | | | | |

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler**

Company Name: Heartland Automotive, LLC
Address City IN Zip: 300 South Warren Drive, Greencastle, Indiana 46135
Part 70 SSM: 133-13901
Plt ID: 133-00027
Reviewer: Edward A. Longenberger
Date: February 9, 2001

| | |
|--------------|--------------|
| S-12 | 3.50 |
| S-13 | 2.50 |
| S-15 | 0.50 |
| MAU-3 | 33.88 |
| MAU-4 | 5.05 |
| Total | 45.43 |

| | |
|---------------------------------|---------------------------------|
| Heat Input Capacity MMBtu/hr | Potential Throughput MMCF/yr |
| 45.43 | 397.97 |

| Emission Factor in lb/MMCF | Pollutant | | | | | |
|-------------------------------|-----------|-------|-------|----------------------|------|------|
| | PM* | PM10* | SO2 | NOx | VOC | CO |
| | 1.9 | 7.6 | 0.6 | 100.0 **see below | 5.5 | 84.0 |
| Potential Emission in tons/yr | 0.378 | 1.51 | 0.119 | 19.9 | 1.09 | 16.7 |

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
 See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: Heartland Automotive, LLC
Address City IN Zip: 300 South Warren Drive, Greencastle, Indiana 46135
Part 70 SSM: 133-13901
Pit ID: 133-00027
Reviewer: Edward A. Longenberger
Date: February 9, 2001

HAPs - Organics

| | | | | | |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf | Benzene 2.1E-03 | Dichlorobenzene 1.2E-03 | Formaldehyde 7.5E-02 | Hexane 1.8E+00 | Toluene 3.4E-03 |
| Potential Emission in tons/yr | 4.179E-04 | 2.388E-04 | 1.492E-02 | 3.582E-01 | 6.765E-04 |

HAPs - Metals

| | | | | | | |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|---------------|
| Emission Factor in lb/MMcf | Lead 5.0E-04 | Cadmium 1.1E-03 | Chromium 1.4E-03 | Manganese 3.8E-04 | Nickel 2.1E-03 | Total HAPs |
| Potential Emission in tons/yr | 9.949E-05 | 2.189E-04 | 2.786E-04 | 7.561E-05 | 4.179E-04 | 0.376 |

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.